

**Federal Defenders
OF NEW YORK, INC.**

Southern District
52 Duane Street-10th Floor, New York, NY 10007
Tel: (212) 417-8700 Fax: (212) 571-0392

David E. Patton
Executive Director

Southern District of New York
Jennifer L. Brown
Attorney-in-Charge

December 10, 2020

VIA ECF

Honorable Paul A. Engelmayer
United States District Judge
Southern District of New York
40 Foley Square
New York, NY 10007

**Re: United States v. Jose Perez
19 Cr. 297 (PAE)**

Dear Judge Engelmayer,

I write to request that the Court adjourn the conference currently scheduled for Tuesday, December 15, 2020 at 12 p.m., to the first week of January. The Government by Assistant United States Attorney Jacob Fiddelman consents to this application.

As the Court is aware, the MDC failed to make Mr. Perez available for meetings with counsel on multiple occasions leading up to our December 3 conference, and the MDC failed to produce him for Court that day. I have now been able to speak with Mr. Perez on one occasion, but that single telephonic conference was insufficient to cover all of the topics we need to discuss before reporting to the government and the Court how we wish to proceed with the case.

Therefore, I request this three-week adjournment so that Mr. Perez can have additional time to consult with counsel.


Given the nature of this request, the defense consents to the exclusion of time under the Speedy Trial Act until the newly selected date.

Thank you for your consideration.

Respectfully submitted,
/s/
Sylvie Levine
Attorney for Mr. Perez
212-417-8729

GRANTED. The Court adjourns the December 15, 2020 conference until January 5, 2021 at 10:30 a.m. and excludes time until then next conference under 18 U.S.C. 3161(h)(7) (A), to enable defense counsel and the defendant to speak more fully about the direction of the case and a potential disposition. The Clerk of Court is requested terminate the motion at Dkt. No. 99.

SO ORDERED.



PAUL A. ENGELMAYER
United States District Judge